

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

ROBERT RIVET	:	Case No. C-1-02-164
	:	
Plaintiff	:	Judge Dlott
	:	
vs.	:	
	:	
FORD MOTOR COMPANY	:	PLAINTIFF'S MOTION
	:	FOR ADDITIONAL
	:	<u>EXTENSION OF TIME</u>
Defendant	:	

Now comes Plaintiff, and for the reasons set forth in the attached memorandum, requests an additional extension of time until September 17, 2003 to file his memorandum in opposition to Defendant's motion for summary judgment.

Respectfully submitted,

s/ David Torchia
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Attorney for Plaintiff

MEMORANDUM

Plaintiff previously requested and was granted a 10-day extension of time until August 28, 2003 to file his memorandum in opposition to Defendant's motion for

summary judgment. On August 28, 2003, Plaintiff filed a second motion for an extension requesting until September 5, 2003 to file his memorandum.

Counsel for Plaintiff has been consumed with preparation and deadlines for various submissions for a jury trial scheduled to begin on September 9, 2003. The trial is anticipated to last until September 12, 2003. Counsel has not had sufficient time to properly address Defendant's motion and needs additional time to complete his brief.

In light of the foregoing, Plaintiff requests an extension of time until September 17, 2003 to file his memo in opposition. As noted in Plaintiff's previous requests for extensions, the pretrial and trial dates were recently vacated and no new dates have been established.

Respectfully submitted,

s/ David Torchia
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2003, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Jeffery L. VanWay, Esq., Baker & Hostetler, LLP, 312 Walnut Street, Suite 3200, Cincinnati, Ohio 45202.

s/ David Torchia
David Torchia